

Chiccine, Catherine

From: Chiccine, Catherine
Sent: Tuesday, December 6, 2022 10:05 AM
To: Knowles, Susan B
Subject: FW: Notification to Restart City of St. Charles Production Wells
Attachments: Letter to city re return to operation of inactive wells.pdf

From: Jurgens, Bob <Jurgens.Bob@epa.gov>
Sent: Friday, December 2, 2022 4:01 PM
To: Nicholas Galla <Nicholas.Galla@stcharlescitymo.gov>
Cc: Washburn, Ben <washburn.ben@epa.gov>; Chiccine, Catherine <chiccine.catherine@epa.gov>; Hoefer, David <Hoefer.David@epa.gov>; Sperry, Clint <Sperry.Clint@epa.gov>; Howell, Tonya <Howell.Tonya@epa.gov>; 'Ilesanmi, Olufeyisayo' <Feyi.ilesanmi@dnr.mo.gov>; McDonald, Brenna <brenna.mcdonald@dnr.mo.gov>; Hannah Humphrey <hannah.humphrey@dnr.mo.gov>; 'brian.quinn@dnr.mo.gov' <brian.quinn@dnr.mo.gov>; 'tj.graven@dnr.mo.gov' <tj.graven@dnr.mo.gov>; Michael Cullen <Michael.Cullen@stcharlescitymo.gov>; Brad Temme <Brad.Temme@stcharlescitymo.gov>; Larry Dobrosky <Lawrence.Dobrosky@stcharlescitymo.gov>; Lawrence Perney <Lawrence.Perney@stcharlescitymo.gov>; John Phillips <John.Phillips@stcharlescitymo.gov>; 'Paul Michalski' <paul.michalski@212environmental.com>; Todd Aseltyne <todd.aseltyne@212environmental.com>; 'brown.randolph@dnr.mo.gov' <brown.randolph@dnr.mo.gov>; 'Monte McKillip' <monte@mckillipassociates.com>; Ndubuka, Chinwe <chinwe.ndubuka@dnr.mo.gov>
Subject: RE: Notification to Restart City of St. Charles Production Wells

Attached is EPA's response to the City's request to restart several PWS wells near contaminated sites. EPA is committed to helping the city maximize PWS well use and we do want to do so in a way that allows EPA to best complete the assessment activities commencing on December 5th and avoid mobilization on contamination at the sites. Long term we will work with the city to identify solutions to better maximize the system pumping abilities.

Bob Jurgens | Director
Superfund and Emergency Management Division
U.S. Environmental Protection Agency
Region 7 (Kansas, Missouri, Nebraska, Iowa & Nine Tribes)
(913) 551-7283
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From: Nicholas Galla <Nicholas.Galla@stcharlescitymo.gov>
Sent: Monday, November 21, 2022 5:35 PM
To: Jurgens, Bob <Jurgens.Bob@epa.gov>
Cc: Washburn, Ben <washburn.ben@epa.gov>; Chiccine, Catherine <chiccine.catherine@epa.gov>; Hoefer, David <Hoefer.David@epa.gov>; Sperry, Clint <Sperry.Clint@epa.gov>; Howell, Tonya <Howell.Tonya@epa.gov>; 'Ilesanmi, Olufeyisayo' <Feyi.ilesanmi@dnr.mo.gov>; McDonald, Brenna <brenna.mcdonald@dnr.mo.gov>; Hannah Humphrey <hannah.humphrey@dnr.mo.gov>; 'brian.quinn@dnr.mo.gov' <brian.quinn@dnr.mo.gov>; 'tj.graven@dnr.mo.gov' <tj.graven@dnr.mo.gov>; Michael Cullen <Michael.Cullen@stcharlescitymo.gov>; Brad Temme <Brad.Temme@stcharlescitymo.gov>; Larry Dobrosky <Lawrence.Dobrosky@stcharlescitymo.gov>; Lawrence Perney <Lawrence.Perney@stcharlescitymo.gov>; John Phillips <John.Phillips@stcharlescitymo.gov>; 'Paul Michalski' <paul.michalski@212environmental.com>; Todd Aseltyne <todd.aseltyne@212environmental.com>; 'brown.randolph@dnr.mo.gov' <brown.randolph@dnr.mo.gov>; 'Monte McKillip' <monte@mckillipassociates.com>;

Ndubuka, Chinwe <chinwe.ndubuka@dnr.mo.gov>

Subject: Notification to Restart City of St. Charles Production Wells

Mr. Jurgens,

Per our discussion last Thursday, this email serves to provide the USEPA and Missouri DNR with notification that the City of St. Charles intends to restart our fully operating drinking water production wells CW-4, CW-5, CW-6, and CW-8. We are requesting that the USEPA and Missouri DNR provide the City of St. Charles with a list of the requirements and actions that will be taken by Ameren Missouri and other responsible parties to ensure the safe resumption in operation of these four drinking water wells within 7-days. We will be suspending operations of drinking water wells CW-7, CW-9, and CW-10 simultaneous to restarting the four aforementioned drinking water wells that had been shut down due to the proximity or confirmed presence of contamination from Ameren Missouri or the other responsible parties. This will allow the City of St. Charles to perform necessary maintenance on the three otherwise overworked drinking water wells. We look forward to your response and continued engagement with the USEPA and Missouri DNR.

Thanks,
Nick

Nicholas Galla, P.E.

Director of Public Works

[City of Saint Charles, MO](#)

O: 636-255-6135 | Cell: 314-609-3290 | nicholas.galla@stcharlescitymo.gov



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

VIA EMAIL

Nicholas Galla, PE
Director of Public Works
City of St. Charles, Missouri
nicholas.galla@stcharlescitymo.gov

RE: Operation of City Wells - Elm Point Wellfield, St. Charles, St. Charles County, Missouri

Dear Mr. Galla:

Thank you for your November 21, 2022, email regarding the planned pumping of the city of St. Charles' public water supply wells. The EPA is supportive of the city's efforts to safely restore operation of municipal wells that the city has shut down over the years due to detections of volatile organic compounds. The EPA would like to work with the city to determine the most responsible way to turn these wells on to ensure that the city's water supply remains protected.

In your email you state that the city wishes to begin pumping city wells CW-4, CW-5, CW-6, and CW-8 immediately, while shutting down city wells CW-7, CW-9, and CW-10 for maintenance. EPA recommends the city continue its historical practice of staggering well maintenance rather than shutting down multiple wells at one time.

Additionally, as you are aware, the EPA will be conducting fieldwork December 5 through December 16, 2022, to investigate the groundwater contamination around PZ-11 and CW-6. It is imperative that the EPA complete this investigation to determine the source of the contamination impacting this area. To conduct an accurate investigation, the EPA is requesting that the city not pump CW-5 and CW-6 until the fieldwork can be completed in mid-December. Dramatic changes in the current pumping of the city's wells prior to the investigation could change aquifer conditions and make it harder for the EPA to ascertain the source of the contamination in PZ-11 and CW-6.

Although the EPA is requesting that the city not turn on CW-5 and CW-6 until after the December investigation is complete, the EPA is prepared to assist the city in its request to begin pumping CW-4 and CW-8 as soon as possible. The EPA requests that the city provide two weeks' notice prior to turning on the wells so that coordination of sampling can take place. Once these two wells are turned on, Ameren has agreed to perform bi-weekly sampling of CW-4, an upgradient monitoring well, and the Elm Point Treatment Plant's influent and effluent,¹ and the OU3 Group has agreed to perform bi-weekly sampling of CW-8 and an upgradient monitoring well. To perform this sampling, Ameren and the OU3 Group will require timely access from the city.

Once CW-4 and CW-8 are turned on, the bi-weekly sampling will commence and continue for three months. If there are no contaminants or no increasing trends by the end of the three months, the

¹ The OU3 Group will continue to sample the Elm Point Treatment Plant's influent and effluent semi-annually.



sampling of the wells will move to monthly sampling for an additional three months. After those three months, if there are still no contaminants or increasing trends, then sampling of the wells will be conducted quarterly for one year. After the year has ended, sampling of the wells will be moved to annually. If sampling shows an increasing contaminant trend in any of the wells during this 18-month period, and the city wishes to continue operation of the wells, sampling will be conducted weekly. If weekly sampling is triggered, discussions with all parties will ensue to determine the appropriate actions to be taken to address the contamination.

As we move forward on working with the city to safely resume operations of city wells, including CW-5 and CW-6, the EPA requests that the city provide notice of significant changes to the city's pumping scheme, including two weeks' notice before starting a city well that has been inactive for more than 30 days. The EPA also requests that the city provide pumping rates for all active wells on a monthly basis. These notifications will allow the EPA to better evaluate how the city's pumping of certain wells on their own, and in conjunction with each other, may impact the contaminated groundwater plume. Finally, the EPA requests that the city please provide all of the city's sampling data regarding CW-4, CW-5, CW-6, and CW-8, that it has not already provided to the EPA, or please confirm that you have already provided all of the city's sampling data.

The EPA has also reached out to the Missouri Department of Natural Resources (MoDNR), and it has expressed its willingness to work with the city to provide additional sampling. This includes having its St. Louis Regional Office collect additional entry point compliance samples and additional production well sampling. Please contact MoDNR directly regarding a process for its staff to conduct independent sampling on any reactivated city wells.

The EPA is committed to discussing these issues or any remaining concerns with you. Please contact Tonya Howell at (913) 551-7589 or howell.tonya@epa.gov, or Clint Sperry at (913) 551-7157 or sperry.clint@epa.gov, if you have questions or need additional information. We look forward to working with the city to restore the operation of St. Charles public water supply wells.

Sincerely,

Robert D. Jurgens
Director
Superfund and Emergency Management Division